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*[Defendants' counsel listed on next page]*

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

SEANDEE GAYDEN, an individual, on  
behalf of herself and on behalf of all  
persons similarly situated,

Plaintiffs,

vs.

FEDEX FREIGHT, INC., a  
Corporation; and DOES 1 through 50,  
inclusive,

Defendants.

**CASE NO.: 2:23-cv-06560-MCS-AS**

*[Assigned for all purposes to the Honorable  
Mark C. Scarsi, Courtroom 7C]*

**JOINT NOTICE OF SETTLEMENT  
AND REQUEST TO VACATE TRIAL  
DATE AND RELATED DEADLINES**

Complaint Filed: May 23, 2023  
Removal Filed: August 11, 2023

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11 FEDEX FREIGHT, INC.  
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**TO THE HONORABLE COURT, ALL PARTIES, AND THEIR ATTORNEYS OF RECORD:**

Plaintiff SEANDEE GAYDEN (“Plaintiff”) and Defendant FEDEX FREIGHT, INC. (“Defendant”) (collectively, the “Parties”) hereby submit the following Notice of Settlement and Request to Vacate Trial Date and Related Deadlines.

The Parties attended mediation on June 27, 2024 with experienced wage and hour mediator Kevin Barnes during which time the Parties reached an agreement to settle the matter. The Parties are now jointly preparing a longform settlement agreement. In light of the foregoing, the Parties respectfully request that the Court vacate the January 7, 2025 trial date and related deadlines.

DATED: July 16, 2024

**FEDEX FREIGHT, INC.**

By: /s/ Sandra Isom

Sandra Isom  
Shahram Samie

Attorneys for Defendant  
FedEx Freight, Inc.

DATED: July 16, 2024

**BLUMENTHAL NORDREHAUG  
BHOWMIK DE BLOUW LLP**

By: /s/ Andrew G. Ronan

Victoria B. Rivapalacio  
Christine T. LeVu  
Andrew G. Ronan

Attorneys for Plaintiff

\*Pursuant to L.R. 5-4.3.4(a)(2)(i), the undersigned attorney hereby attests that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing's content and have authorized the filing.

DATED: July 16, 2024

**BLUMENTHAL NORDREHAUG  
BHOWMIK DE BLOUW LLP**

By: /s/ Andrew G. Ronan  
Andrew G. Ronan

Attorneys for Plaintiff

**CERTIFICATE OF SERVICE [F.R.C.P. §5]**

I am a citizen of the United States and a resident of the State of California. I am employed in the County of San Diego, State of California. I am over the age of 18 and not a party to the within action. My business address is 2255 Calle Clara, La Jolla, CA 92037. On July 16, 2024, I served the document(s) described as below in the manner set forth below:

**1. JOINT NOTICE OF SETTLEMENT AND REQUEST TO VACATE  
TRIAL DATE AND RELATED DEADLINES**

**XX**

(BY ELECTRONIC SERVICE): I caused the listed documents to be electronically filed through the CM/ECF system at the United States District Court for the Central District of California which generates a Notice of Electronic Filing to all parties and constitutes service of the electronically filed documents on all parties for purposes of the Federal Rules of Civil Procedure.

**XX**

(Federal): I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made, and that the foregoing is true and correct under penalty of perjury.

I declare under penalty of perjury under the laws of the State of California that the foregoing is true and correct. Executed on July 16, 2024, at San Diego, California.

/s/ Andrew G. Ronan

Andrew G. Ronan